

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SULLIVAN

----- X
PAMELA FELDERHAMILTON

Index No:

E2022-20

Plaintiff,

-against-

COMPLAINT

MICHAEL ANTONIO MORILLO LUCIANO and RD
EXPRESS, INC.,

Defendants.
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Plaintiff, by her attorney, GARY WALDMAN, ESQ., complaining of the
defendants herein, alleges as follows:

1. At all times herein, plaintiff was and is a resident of the County of Sullivan and State of New York.
2. At all times herein, plaintiff was the owner and operator of a 2016 Chevy bearing New York State License Plate Number BKA3318.
3. At all times herein, defendant, RD EXPRESS, INC., was the owner of a 2012 freight delivery vehicle bearing Pennsylvania License Plate Number AG83926.
4. Upon information and belief, at all times herein, defendant, RD EXPRESS, INC., was and is a foreign corporation authorized to do business in the State of New York.
5. At all times herein, defendant, MICHAEL ANTONIO MORILLO LUCIANO, was the operator of the aforesaid motor vehicle owned by defendant, RD

EXPRESS, INC., and was operating same with their permission and consent.

6. At all times herein, defendant, MICHAEL ANTONIO MORILLO LUCIANO, was in the scope of his employment with the said owner of the vehicle, defendant, RD EXPRESS, INC..

7. On September 10, 2021 at approximately 2:00 p.m., while the plaintiff's and defendant's vehicles as aforesaid were in the parking lot at the Shoprite Mall located on Route 52 in Liberty, New York, they came into contact.

8. The aforesaid accident and injuries resulting there from to the plaintiff were caused solely by the negligence of the defendants.

9. As a result of the foregoing accident, the plaintiff has sustained a "serious injury" as defined under Section 5102 of the Insurance Law.

WHEREFORE, plaintiff demands judgment against the defendants in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of the action.

Dated: Monticello, New York
January 4, 2022

Yours, etc.



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